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*Attorneys for Defendants Jennifer Johnson, Project
Velocity Inc. and Project Velocity Partners, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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CC FORD GROUP WEST, LLC,	:
	:
Plaintiff,	: Case No. 3:22-cv-04143
	:
v.	: NOTICE OF DEFENDANTS’
	: MOTION TO DISMISS SECOND
JENNIFER JOHNSON, CARRIE BICKING,	: AMENDED COMPLAINT
BETH WEILER, PROJECT VELOCITY, INC.,	:
PROJECT VELOCITY PARTNERS, LLC,	:
MEREDITH MANNING, PHARMAESSENTIA	: Return Date: January 6, 2025
USA CORP., MATTHEW ORNELAS-KUH, and	:
JOHN DOES 1-10,	:
	:
Defendants,	:
	:
v.	:
	:
JOHN STUDDIFORD,	:
	:
Counterclaim-Defendant	:
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PLEASE TAKE NOTICE that on January 6, 2025 at 9:00 A.M. or on such date and time set by the Court, Defendants Jennifer Johnson (“Johnson”), Project Velocity, Inc. (“PVI”), and Project Velocity Partners, LLC (“PVP” and with Johnson and PVI, “PVI Defendants”), by their counsel Critchley & Luria, LLC and Slarskey LLC, shall move before the Honorable Michael A. Shipp, U.S.D.J. at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ, for the entry of an Order granting Defendants’ Motion to Dismiss pursuant

to Rule 12(b)(6) of the Federal Rules of Civil Procedure for failure to state a claim, with prejudice.

PLEASE TAKE FURTHER NOTICE the PVI Defendants shall rely upon the accompanying Brief, Certification of Counsel, all prior pleadings and motions filed herein. The PVI Defendants respectfully request Oral argument if opposition is timely filed.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 7.1(d), the PVI Defendants have filed a propose form of Order granting this motion.

Dated: November 18, 2024

CRITCHLEY KINUM & LURIA, LLC

By: /s/ Amy Luria
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